

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED:
v.	:	CRIMINAL NO. 04 -
ROBERT JARDIN	:	VIOLATIONS: 18 U.S.C. §§ 371 and 2;
a.k.a. Robert Jardine	:	49 U.S.C. §§ 32705(a) and 32709(b)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

1. At times relevant and material to this Information, defendant ROBERT JARDIN (a.k.a. ROBERT JARDINE) was engaged in the buying and selling of used motor vehicles. Defendant ROBERT JARDIN operated under the business name Bridgewater Rental & Leasing.

2. As used in this Information, the following vehicle numbers refer to the vehicles identified below:

<u>Vehicle No.</u>	<u>Year/Make</u>	<u>Vehicle Identification Number</u>
1	1997 Chevrolet	2G1WL52M9V9194774
2	1996 Pontiac	1G2HX52KXT4222539

THE CONSPIRACY

3. Beginning at least as early as May 1994, and continuing through at least July 1999, in the Eastern District of Pennsylvania and elsewhere, ROBERT JARDIN, defendant herein, did knowingly and intentionally combine, conspire, confederate, and agree with Dean Jardine and other persons to commit offenses against the United States, that is:

a. knowingly to reset and alter, and cause to be reset and altered, the odometers of motor vehicles, intending to change the mileage registered by the odometers, in violation of Title 49, United States Code, Sections 32703(2) and 32709(b);

b. to transport and cause to be transported in interstate commerce, with unlawful and fraudulent intent, falsely made, forged, altered, and counterfeited securities -- namely, motor vehicle certificates of title -- knowing the same to be falsely made, forged, altered, and counterfeited, in violation of Title 18, United States Code, Section 2314; and

c. knowingly to give and cause to be given, in making the written disclosures to the buyers of used motor vehicles required by Title 49, United States Code, Section 32705(a), and Title 49, Code of Federal Regulations, Part 580, false statements relating to the actual mileage of the vehicles, in violation of Title 49, United States Code, Sections 32705(a) and 32709(b).

PURPOSE OF THE CONSPIRACY

4. It was the purpose of the conspiracy to cause both the immediate and subsequent buyers of used motor vehicles, including ultimate consumers, to pay more for the vehicles than they would have paid if they had known the vehicles' correct mileage readings.

MANNER AND MEANS BY WHICH THE CONSPIRACY OPERATED

5. It was a part of the conspiracy that the defendant, along with his co-conspirators, purchased at least 75 used motor vehicles, caused the odometers of those vehicles to be rolled back to lower mileage figures, made fraudulent alterations to the titles, and resold the vehicles to purchasers in the Eastern District of Pennsylvania and elsewhere, representing to the purchasers that the false low-mileage readings were the vehicles' correct mileage readings.

6. It was further part of the conspiracy that the defendant, using his dealership name, Bridgewater Rental & Leasing, purchased high-mileage used motor vehicles for resale from private parties, automobile dealers, and automobile auctions in New Jersey and elsewhere.

7. It was further part of the conspiracy that after purchasing those vehicles, the

defendant caused the vehicles' odometers to be rolled back to lower mileage figures (vehicles with such altered odometers are called "rolled-back vehicles" below).

8. It was further part of the conspiracy that the defendant caused automobile titles and other motor vehicle title and ownership documents to be physically altered so that the mileage figures on those documents corresponded to the false low mileage odometer readings on the rolled-back vehicles.

9. It was further part of the conspiracy that the defendant caused falsely made, forged, altered and counterfeited titles and vehicle reassignment documents to be transported in interstate commerce to and within the Eastern District of Pennsylvania and elsewhere, for use in sales of those motor vehicles.

10. It was further part of the conspiracy that the defendant and his co-conspirators sold, and caused to be sold, the rolled-back vehicles to purchasers in Pennsylvania, and elsewhere, using the business names Bridgewater Rental & Leasing and others.

11. It was further part of the conspiracy that in connection with the sale of the rolled-back vehicles, the defendant and his co-conspirators provided false low mileage odometer disclosure statements to subsequent purchasers and to the motor vehicles division of the New Jersey Department of Transportation.

12. It was further part of the conspiracy that the co-conspirators' actions and misrepresentations led the defendant to receive higher prices for the vehicles sold than he would have received if the vehicles had correct mileage readings, and that buyers of the vehicles, including ultimate consumers, paid more for the vehicles than they would have paid if they had known the vehicles' true mileage.

OVERT ACTS

13. In order to effect and accomplish the objects and purposes of the conspiracy, ROBERT JARDIN and his co-conspirators did commit numerous overt acts, in the Eastern District of Pennsylvania and elsewhere, among which were the following:

Vehicle No. 1

a. On or about June 30, 1999, defendant ROBERT JARDIN, using the name Bridgewater Rental & Leasing, purchased Vehicle No. 1 with at least 79,000 miles on the odometer from an automobile leasing company in Upper Montclair, New Jersey, for \$7,500.

b. On or about July 8, 1999, defendant ROBERT JARDIN obtained a new title for Vehicle No. 1 by submitting to the State of New Jersey a title application falsely certifying that Vehicle No. 1 had 29,502 miles.

c. On or about July 9, 1999, defendant ROBERT JARDIN caused to be transported in interstate commerce, from New Jersey to Pennsylvania, the title he obtained for Vehicle No. 1 containing a mileage certification he knew to be false.

d. On or about July 9, 1999, in connection with the sale of Vehicle No. 1 at Manheim Auto Auction in Manheim, Pennsylvania, defendant ROBERT JARDIN signed an odometer statement falsely certifying that Vehicle No. 1 had only 29,737 miles.

e. On or about July 12, 1999, defendant ROBERT JARDIN deposited a check for \$9,330 issued by Manheim Auto Auction as payment for the sale of Vehicle No. 1 into a bank account carrying the name Bridgewater Rental & Leasing and controlled by the defendant.

Vehicle No. 2

f. On or about July 15, 1999, defendant ROBERT JARDIN, using the name Bridgewater Rental & Leasing, purchased Vehicle No. 2 with at least 79,000 miles on the odometer from an automobile leasing company in Upper Montclair, New Jersey, for \$7,900.

g. On or about July 29, 1999, defendant ROBERT JARDIN obtained a new title for Vehicle No. 2 by submitting to the State of New Jersey a title application falsely certifying that Vehicle No. 2 had 30,490 miles.

h. On or about July 30, 1999, defendant ROBERT JARDIN caused to be transported in interstate commerce, from New Jersey to Pennsylvania, the title he obtained for Vehicle No. 2 containing a mileage certification he knew to be false.

i. On or about July 30, 1999, in connection with the sale of Vehicle No. 2 at Manheim Auto Auction in Manheim, Pennsylvania, defendant ROBERT JARDIN signed an odometer statement falsely certifying that Vehicle No. 2 had only 31,313 miles.

j. On or about August 2, 1999, defendant ROBERT JARDIN deposited a check for \$9,480 issued by Manheim Auto Auction as payment for the sale of Vehicle No. 2 into a bank account bearing the name Bridgewater Rental & Leasing and controlled by the defendant.

In violation of Title 18, United States Code, Section 371.

COUNTS TWO AND THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

14. Paragraphs 1 and 2 of Count One are realleged and incorporated herein by reference.

15. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, ROBERT JARDIN, defendant herein, did knowingly and willfully give and cause to be given, in making the written disclosures to the buyers of used motor vehicles required by Title 49, United States Code, Section 32705(a), and Title 49, Code of Federal Regulations, Part 580, false statements relating to the cumulative mileage registered on the odometers of the motor vehicles listed below, in that the defendant certified as accurate the false mileages listed below, when in fact the odometers of the vehicles had registered the high mileages listed below when the defendant acquired the vehicles, each such instance being a separate and additional Count of this Information:

<u>Count</u>	<u>Vehicle No.</u>	<u>Date</u>	<u>High Mileage</u>	<u>False Mileage</u>
2	1	July 9, 1999	79,000	29,737
3	2	July 30, 1999	79,000	31,313

In violation of Title 49, United States Code, Sections 32705(a) and 32709(b), and Title 18, United States Code, Section 2.

PATRICK L. MEEHAN
United States Attorney